

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: DRAFT

Region: Mooresville Regional Office
County: Gaston
NC Facility ID: 3600137
Inspector's Name: Jim Vanwormer
Date of Last Inspection: 11/07/2019
Compliance Code: W / Violation - procedures

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): Mann+Hummel Filtration Technology - Allen Plant</p> <p>Facility Address: Mann+Hummel Filtration Technology - Allen Plant 2900 Northwest Boulevard Gastonia, NC 28052</p> <p>SIC: 3714 / Motor Vehicle Parts & Accessories NAICS: 336399 / All Other Motor Vehicle Parts Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p align="center">Permit Applicability (this application only)</p> <p>SIP: 02D .0503, .0515, .0516, .0521, .0902, .0958, .0967 NSPS: NESHAP: 02D .1100 (MMMM, DDDDD) PSD: PSD Avoidance: 02Q .0317 (PSD, Nonattainment Area New Source Review) NC Toxics: 02D .1100, 02Q .0711 112(r): Other:</p>																																																				
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<p>Review Engineer: Jenny Sheppard</p> <p>Review Engineer's Signature: _____ Date: DRAFT</p>				<p align="center">Comments / Recommendations:</p> <p>Issue 03860/T28 Permit Issue Date: DRAFT Permit Expiration Date:</p>																																																			

1. Purpose of Application:

This permitting action is a renewal of an existing Title V permit pursuant to 15A NCAC 02Q .0513. The existing Title V permit (03860T27) was issued on August 29, 2016. The renewal application was received on March 4, 2020 (renewal due date was January 31, 2020) and deemed complete. The renewal application submittal is considered late and the permit shall expire on October 31, 2020 unless the permit renewal is issued prior to expiration. The application also requests the removal of Air Filter Line No. 8, remove references to after burner CD-59 in Section 2.1 B.3 as it has been removed, change natural gas-fired burner to natural gas direct-fired burner, request to change the PSD Avoidance in Section 2.2 B.2. from 250 tons to 40 tons (This will not be changed see section 6 below)

2. Facility Description

Mann+Hummel Filtration Technology – Allen Plant manufactures air, fuel, and oil filters for internal combustion engines in Gastonia, NC. The facility is operating under the existing air permit 03860T27 issued on August 29, 2017.

3. History/Background/Application Chronology

November 16, 2015 – Renewal and 502(b)(10) Modification (add MACT DDDDD and remove sources), permit number 03860T26 issued by Russell Braswell.

August 29, 2016 – Ownership/Name Change, permit 03860T27 issued by Connie Horne.

March 4, 2020 – Late Renewal application submittal. The renewal request was due by January 31, 2020.

4. Permit Modifications/Changes and ESM Discussion

Table of changes to permit 06156T12

Page(s)	Section	Description of Change(s)
Throughout		Update permit revision number and issue date, revise insignificant activity list and TVEE, Updated RO.
	Insignificant Activities	Add Insignificant activities from Applicability Determinations and the renewal application. Corrected descriptions of I.A.s as requested. (ID Nos. IES-LS-D-1, IES-LS-D-2, IES-LS-NPP-1, IES-LS-E-1A, IES-LS-E-1B, IES-RC-E-1, IES-FM-OV-1, IES-FM-PP-1, and IES-FM-PL-1 (T&B), added L-SEAM Line (ID Nos. IES-LS-D-1, IES-LS-D-2, IES-LS-NPP-1, IES-LS-E-1A, and IES-LS-E-1B) ROLL COAT Line (ID No. IES-RC-E-1), and FM Line (ID Nos. IES-FM-OV-1, IES-FM-PP-1, and IES-FM-PL-1 (T&B))
3-5	Section 1, Table	Removed Air Filter Line No. 8 (ID Nos. ES-8A and ES-8B) as requested. Updates rule references to approved format.
6-XX	Section 2.1- All	Updated all formatting to match permit shell and current permitting procedures. Starting in Section 2.1 A through 2.2 B updating all conditions to current language and other permit language as it applies. Removing references to Air Filter Line No. 8.
6 and 7	Section 2.1 A	Updated source description, updated conditions 02D .0515 and .0516.
8 thru 12	Section 2.1 B	Updated source descriptions, included emission source IDs in summary of limits table, updated conditions 02D .0515, .0516, .0521, and .0967
13 thru 16	Section 2.1 C	Updated conditions 02D .0515, .0521, and .0967

Page(s)	Section	Description of Change(s)
17 thru 20	Section 2.1 D	Updated sources descriptions, updated conditions 02D .0515, .0521, 02Q .0317.
21 thru 25	Section 2.1 E	Removed 112(j) reference and requirements and updated 02D .1111 MACT condition
26 thru 44	Section 2.2	Updated formatting and conditions to match permit shell and conditions shell
45 thru 54	Section 3	General Conditions updated to current language (version 5.3, 08/21/2018)

5. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes

15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources

15A NCAC 02D .0521, Control of Visible Emissions

15A NCAC 02D .0902(b), Applicability for Volatile Organic Compounds (RACT Exempt, less than 1 pound VOC per day)

15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds

15A NCAC 02D .0967, Miscellaneous Metal and Plastic Parts Coatings

15A NCAC 02D .1100, Control of Toxic Air Pollutants - State Only

15A NCAC 02D .1111, Maximum Achievable Control Technology: MACT MMMM and DDDDD, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products and NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters

15A NCAC 02Q .0317, Avoidance PSD and Nonattainment Area New Source Review Avoidance

15A NCAC 02Q .0711, Emission Rates Requiring a Permit - State only

A regulatory review for these current permit conditions will not be included in this document as the applicability to these has not changed from when it was originally established. Where applicable, the permit conditions have been modified to reflect current working shell conditions. The 112(j) Case by Case Maximum Achievable Control Technology (02D .1109) requirement for the boilers has been removed since the sunset date for that condition has passed.

6. NSPS, NESHAPS/MACT, PSD/NSR, 112(r), RACT, CAM

NSPS

None

NESHAP/MACT

This facility is considered a major source of hazardous air pollutants. As such, NESHAP, Subpart MMMM “Surface Coating for Miscellaneous Metal Parts and Products” applies to the coating operations in their filter lines (Oil and Fuel Filter Lines Nos. 6, 16, 40, and 53 and Silicone Line No. 2). NESHAP, Subpart DDDDD “Industrial, Commercial, and Institutional Boilers and Process Heaters” applies to the existing boilers (ID Nos. ES-CC-30-1 and ES-WH).

PSD

This facility is currently minor for PSD purposes. This permit renewal does not affect this status. The facility requested that Section 2.2 B.2 be modified to reflect the 40 ton per year limit for VOC instead of the stated 250 ton per year. The 40 ton per year limit for Line No. 32 that the facility is referring was a 02D .0531 limit for Nonattainment Areas contained in Section 2.1 D.4 and the PSD 250 ton per year avoidance condition in Section 2.2 B.2 was for a group of emission sources, including Line No. 32. All of the other emission sources in that

condition have been removed from the facility so the condition will remain as is with the 250 ton per consecutive 12-month period.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

RACT

Mann+Hummel is located in Gaston County, which has previously been considered an area of ozone nonattainment. Consequently, Mann+Hummel had been reviewed for RACT for NOx and VOC. It was determined that only VOC rules applied.

Gaston County was re-designated as an area of ozone attainment on August 27, 2015. Part of the re-designation process required that DAQ continue to implement RACT rules already contained in the permits. No change to the current RACT rule conditions in the permit.

CAM

40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility that have pre-controlled emissions above the major source threshold and use a control device to meet an applicable standard. The facility has evaluated each source for CAM applicability (T25 and T26) and has determined that the sources either do not have a control device to meet compliance with an emission limit or a standard for a federally regulated pollutant or the sources have uncontrolled potential emission of less than 100 tons. Therefore, CAM does not apply to this facility at this time. No new control devices have been added since the last renewal (T26).

7. Facility Wide Air Toxics

There is no change required for this renewal.

8. Facility Compliance Status/Compliance History:

The last compliance inspection was performed on November 7, 2019 by Jim Vanwormer and the facility was found to be in violation with Section 2.1 E.5.d (failure to complete the one-time energy assessment). At the time of this review the one-time energy assessment had not been completed. Since the last renewal, the facility has been issued two additional Notices of Violation on March 8, 2016 and March 16, 2017. Annual Compliance Certification submitted March 1, 2016 indicated the annual boiler tune-up for ES-WH was not performed. The facility performed the boiler tune-up for both boilers on January 21, 2016. In 2017 the ACC was submitted incomplete and therefore an NOV was sent, a complete ACC was submitted on March 13, 2017.

9. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected state/local program within 50 miles of the facility.

The following comments were received: **TO BE COMPLETED AFTER PUBLIC NOTICE** (*No additional comments received from the public or EPA, all comments from the facility have been addressed and incorporated where appropriate.*)

10. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for the renewal application however the application was sealed by Chalam V. Pakala of Chalam Pakala Engineering and Environmental Solutions on February 28, 2020

A consistency determination was not required for the renewal application.

MRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance. RCO concurs with MRO's recommendation to issue the renewed air permit.